

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT STATE OF OKLAHOMA

(1)	APRIL LAYTON, as personal)
	representative of the Estate of)
	Charles Holdstock, deceased,)
(2)	APRIL LAYTON, individually,)
(3)	VALERIE WINFREY, individually, and))
(4)	MELANIE HUFNAGAL, individually)
)
	Plaintiffs,)
)
vs.) NO. CIV -2009 -1208C
)
(1)	CORRECTIONAL HEALTHCARE)
	MANAGEMENT OF OKLAHOMA,)
	INC., a corporation,)
(2)	THE BOARD OF COUNTY)
	COMMISSIONERS OF OKLAHOMA)
	COUNTY, a Political Subdivision of)
	the State of Oklahoma, and)
(3)	JOHN WHETSEL, individually and in)
	his capacity as Sheriff of Oklahoma)
	County.)
)
	Defendants.)

PLAINTIFFS' COUNTER DEPOSITION DESIGNATIONS
DR. KIM KLANCKE, MD

COME NOW the Plaintiffs and hereby submit their Counter-Designations to the Deposition of Dr. Kim Klancke, M.D. as follows:

P. 7, lines 19-22
P. 14, lines 7-12
P. 24, lines 10-13
P. 26, lines 17-25
P. 30, lines 2-11
P. 32, lines 1-5
P. 45, lines 14-22
P. 85, lines 20-24
P. 91, lines 12-18
P. 94, lines 10-20

P. 97, lines 12-25
P. 98, lines 1-6
P. 117, lines 13-25
P. 118, lines 1-9
P. 119, lines 11-24
P. 120, lines 21-25
P. 121, lines 1-7
P. 122, lines 5-15
P. 123, lines 11-13
P. 128, lines 8-9
P. 129, lines 20-25
P. 130, lines 1-25
P. 131, lines 1; 17-25
P. 132, lines 1; 9-25
P. 133, lines 1-3; 13-20; 24-25
P. 134, lines 1-3; 9-16; 21-25
P. 135, lines 1-23
P. 136, lines 14-25
P. 137, line 1
P. 139, lines 14-25
P. 140, lines 1-25
P. 141, lines 3-7; 24-25
P. 142, lines 1-25
P. 144, lines 7-10
P. 145, lines 21-25
P. 146, lines 3-25
P. 147, lines 1-2
P. 155, lines 23-25
P. 156, line 3.
P. 162, lines 23-25
P. 163, lines 1-17
P. 165, lines 6-14
P. 175, lines 10-13

/s/ E. W. Keller
E. W. Keller, (OBA# 4918)
KELLER, KELLER & DALTON
119 N. Robinson, Suite 825
Oklahoma City, Oklahoma 73102
(405) 235-6693
(405) 232-3301 Facsimile
E-Mail kkd.law@coxinet.net

CERTIFICATE OF SERVICE

I hereby certify that on the 23rd day of November, 2013, I electronically transmitted the attached document to the Clerk of the Court using the ECF System for filing. Based on the records currently on file, the Clerk of the Court will transmit a Notice of Electronic Filing to the following ECF registrants:

Ms. Sandi Elliott
Ms. Lisa Endres

dasanell@oklahomacounty.org
dalisend@oklahomacounty.org

/s/ E. W. Keller